

## Central District of California

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Defendant(s)

Civil Action No. 2:24-cv-02886-WLH-SK

To:

  
Signature of Clerk or Deputy Clerk

Nico Banks, Esq.  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH;	)	Case No.: 2:24-cv-02886
MOULOUD HOCINE;	)	
JENNIFER LEHMKUHL HILL;	)	<b>COMPLAINT FOR:</b>
AMUND THOMPSON;	)	<b>1. FRAUD CONSPIRACY</b>
PAUL PANICO	)	<b>2. FRAUDULENT TRANSFERS</b>
	)	<b>IN FURTHERANCE OF</b>
Plaintiffs,	)	<b>CONSPIRACY</b>
vs.	)	<b>3. CONSPIRACY TO VIOLATE</b>
	)	<b>BUSINESS AND</b>
RYAN CARROLL;	)	<b>PROFESSIONS CODE § 17200</b>
MAX K. DAY;	)	<b>4. VIOLATIONS OF</b>
MAX O. DAY;	)	<b>SECURITIES LAWS</b>
MICHAEL DAY;	)	
YAX ECOMMERCE LLC;	)	
PRECISION TRADING GROUP, LLC;	)	<b>DEMAND FOR JURY TRIAL</b>
WA DISTRIBUTION LLC;	)	
PROVIDENCE OAK PROPERTIES,	)	
LLC;	)	
WA AMAZON SELLER LLC;	)	
MKD INVESTMENT ADVISOR, LLC;	)	
MKD FAMILY BENEFICIARY, LLC;	)	
MKD FAMILY PRIVATE	)	
MANAGEMENT COMPANY, LLC;	)	
MAX DAY CONSULTING, LLC;	)	
HOUTEX FARM EQUITY PARTNERS	)	
LLC;	)	

1 BUSINESS FINANCIAL SOLUTIONS  
2 ADVISORY LLC;  
3 EVO MAXX LLC;  
4 YAX IP AND MANAGEMENT INC.  
5 (D.B.A. "FULFILLABLE");  
6 WWKB LLC;  
7 DREAMS TO REALITY LLC;  
8  
9 Defendants.

10 Plaintiffs—Molund Hocine; Jennifer Lehmkuhl Hill; Amund Thompson;  
11 David Hough; and Paul Panico—by and through their undersigned attorney, hereby  
12 bring this action against Defendants—Ryan Carroll; Max K. Day; Max O. Day;  
13 Michael Day; Yax Ecommerce LLC; Precision Trading Group, LLC; WA  
14 Distribution LLC; Providence Oak Properties, LLC; WA Amazon Seller LLC; MKD  
15 Investment Advisor, LLC; MKD Family Beneficiary, LLC; MKD Family Private  
16 Management Company, LLC; Max Day Consulting, LLC; HouTex Farm Equity  
17 Partners LLC; Business Financial Solutions Advisory LLC; Evo Maxx LLC; Yax IP  
18 and Management Inc; Dreams To Reality LLC; and WWKB LLC—and allege as  
19 follows:  
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23 **JURISDICTION AND VENUE**

- 24 1. Plaintiffs invoke the diversity jurisdiction of the Court pursuant to 28 U.S.C. §  
25 1332 because no Plaintiffs in this action reside in the same state as any  
26 Defendants, and the amount in controversy in each Plaintiff's claim exceeds  
27 \$75,000.  
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